**EXHIBIT I** 

# Proof Of Service / In Re Mario Lavandeira, Jr. (2:25-cv-01396) District Court, D. Nevada

From Perez Hilton <ph@perezhilton.com>

Date Sat 8/2/2025 4:39 PM

To Hilton Perez <ph@perezhilton.com>

Cc Esra Hudson <EHudson@manatt.com>; mgottlieb@willkie.com <mgottlieb@willkie.com>; Stephanie Roeser <SRoeser@manatt.com>; anathan@willkie.com <anathan@willkie.com>; Matthew Bruno <MBruno@manatt.com>; Meryl Governski <mgovernski@dirllp.com>; laura.prather@haynesboone.com <laura.prather@haynesboone.com>; michael.lambert@haynesboone.com <michael.lambert@haynesboone.com>; kbender@willkie.com <kbender@willkie.com>

1 attachment (308 KB) gov.uscourts.nvd.176101.1.0.pdf;

### Counsel,

For your records - this email is to inform you that my Motion To Quash your unenforceable subpoena seeking legally protected and privileged information has been accepted and docketed by the appropriate court.

In Re Mario Lavandeira, Jr. (2:25-cv-01396) District Court, D. Nevada

I am attaching a docketed copy of the subpoena.

Respectfully,

Mario Armando Lavandeira, Jr. Aka Perez Hilton

On Jul 24, 2025, at 11:51 PM, Perez Hilton <ph@perezhilton.com> wrote:

Dear Ms. Hudson,

Thank you for your response.

To clarify, I have not authorized Mr. Freedman or any attorney to represent me in this matter. I am proceeding pro se, as I have publicly stated multiple times in recent days.

Regarding your request: I intend to respond to the subpoena by filing a formal motion to quash. That motion will outline the legal basis and supporting authority for my position — including that the subpoena seeks protected material and constitutes an improper attempt to chill journalistic activity. I have worked as a journalist for over 20 years and am internationally recognized in that capacity.

If you do not withdraw your subpoena, I plan to file my motion to quash on Monday. Filing then will allow me time to make any necessary corrections or adjustments, should the court require them.

# Case 1:24-cv-10049-LJL Document 565-9 Filed 08/06/25 Page 3 of 6

Please let me know by the end of Saturday, July 26th, whether you intend to withdraw the subpoena. I plan to spend Sunday finalizing all materials for submission.

Once filed, I will promptly serve you with a copy of the motion.

Sincerely,

Mario Lavandeira

aka Perez Hilton

On Jul 24, 2025, at 8:44 AM, Hudson, Esra < EHudson@manatt.com > wrote:

Dear Mr. Hilton,

Thank you for your email. Even though you have publicly disclosed that Bryan Freedman is your lawyer, you have informed us that you are not relying on a lawyer in connection with your response to the subpoena and are representing yourself. In order for us to meaningfully consider your request that we withdraw the subpoena in its entirety, please provide the legal basis and supporting authority for your belief that the subpoena is not "legally sound" and we will certainly consider it.

Best regards, Esra Hudson

#### Esra Hudson

Partner and Leader, Employment & Labor <image001.png>

Manatt, Phelps & Phillips, LLP
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From: Perez Hilton <ph@perezhilton.com> Sent: Wednesday, July 23, 2025 1:19 PM To: Hudson, Esra <EHudson@manatt.com>

Cc: mgottlieb@willkie.com; Roeser, Stephanie <SRoeser@manatt.com>; anathan@willkie.com; Bruno, Matthew

<MBruno@manatt.com>; mgovernski@dirllp.com; laura.prather@haynesboone.com;

michael.lambert@haynesboone.com; kbender@willkie.com

Subject: Re: Subpoena Compliance – Request to Meet and Confer

[EXTERNAL] Please do not reply, click links, or open attachments unless you recognize the source of this message and know the content is safe.

Dear Ms. Hudson,

Thank you for your response.

I have objections to the entirety of the subpoena that was issued to me. After careful consideration, research, and consultation, it is my understanding that the subpoena is not legally sound, nor is it enforceable against me.

Accordingly, my formal request is that you withdraw the subpoena in its entirety.

Sincerely,

Mario Lavandeira

aka Perez Hilton

On Jul 23, 2025, at 9:00 AM, Hudson, Esra < EHudson@manatt.com > wrote:

Hello Mr. Hilton,

Thank you for your email. If you have concerns about the subpoena, we are happy to hear them and consider any requests you have. We would appreciate it if you would put them in writing and send them to us so that we may consider them. Also, it may be helpful for you to know that you were subpoenaed because one or more of the Wayfarer Parties identified you in discovery as a content creator with whom they communicated concerning matters related to this case.

Best regards, Esra Hudson

## Esra Hudson

Partner and Leader, Employment & Labor <image001.png>

Manatt, Phelps & Phillips, LLP
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From: Perez Hilton <ph@perezhilton.com>
Sent: Tuesday, July 22, 2025 10:37 PM
To: Hudson, Esra <<u>EHudson@manatt.com</u>>

 $\label{lem:com:model} \textbf{Cc:} \ \underline{mgottlieb@willkie.com}; \ Roeser, \ Stephanie < \underline{SRoeser@manatt.com} >; \ \underline{anathan@willkie.com}; \ Bruno, \\ Matthew < \underline{MBruno@manatt.com} >; \ \underline{mgovernski@dirllp.com}; \ \underline{laura.prather@haynesboone.com}; \\ \end{cases}$ 

<u>michael.lambert@haynesboone.com</u>; <u>kbender@willkie.com</u> **Subject:** Re: Subpoena Compliance – Request to Meet and Confer

[EXTERNAL] Please do not reply, click links, or open attachments unless you recognize the source of this message and know the content is safe.

Dear Ms. Hudson,

Thank you for your response. I understand.

As noted previously, I am representing myself in this matter and am making every effort to comply with all applicable rules and procedures.

I will be filing formal objections with the court and will include documentation of my attempts to confer in good faith.

Sincerely,

/s/ Mario Lavandeira

Mario Armando Lavandeira, Jr.

aka Perez Hilton

On Jul 21, 2025, at 7:08 PM, Hudson, Esra < EHudson@manatt.com > wrote:

Dear Mr. Hilton,

We cannot advise you or answer questions about the legal implications of the subpoena. If you have objections, you are welcome to send them to us.

Best regards, Esra Hudson

#### Esra Hudson

Partner and Leader, Employment & Labor

<image001.png>

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# Case 1:24-cv-10049-LJL Document 565-9 Filed 08/06/25 Page 6 of 6

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From: Perez Hilton <ph@perezhilton.com>
Sent: Monday, July 21, 2025 1:50 PM
To: Hudson, Esra <<u>EHudson@manatt.com</u>>

Cc: mgottlieb@willkie.com; Roeser, Stephanie < SRoeser@manatt.com >;

anathan@willkie.com; Bruno, Matthew < MBruno@manatt.com >; mgovernski@dirllp.com;

laura.prather@haynesboone.com; michael.lambert@haynesboone.com;

kbender@willkie.com

Subject: Subpoena Compliance - Request to Meet and Confer

[EXTERNAL] Please do not reply, click links, or open attachments unless you recognize the source of this message and know the content is safe.

Dear Counsel,

I am writing regarding the subpoena served on me in connection with Lively v. Wayfarer Studios, Case No. 1:24-cv-03157-LJL.

As a non-party to this action and someone representing myself, I am still reviewing the subpoena and seeking to understand its scope and implications. At this time, I have significant concerns about its appropriateness, including whether it complies with applicable legal standards. I also have substantive objections I believe I am required by law to raise with you.

Accordingly, I am reaching out to formally request a meet and confer to discuss these issues. Please let me know your availability this week so that we may arrange a time to speak.

Sincerely,

Mario Lavandeira

aka Perez Hilton